

# **EXHIBIT B**

TIMOTHY ELDER (CA BAR NO. 277152)

ALBERT ELIA (appearing *pro hac vice*)

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*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

**LISAMARIA MARTINEZ,**

Plaintiff,

v.

**COUNTY OF ALAMEDA, MELISSA  
WILK, in her individual capacity, EVA HE,  
in her individual capacity, MARIA LAURA  
BRIONES, in her individual capacity,**

Defendants.

Case No. 3:20-cv-06570-TSH

**PLAINTIFF'S SUPPLEMENTAL  
DISCLOSURES PURSUANT TO FEDERAL  
RULE OF CIVIL PROCEDURE 26(e)**

While Plaintiff has not completed her investigation or analysis of the facts relating to this case and has not completed preparation for trial, she nevertheless hereby supplements her disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure, without prejudice to her right to produce evidence of any subsequently discovered facts or interpretations of facts, or to otherwise further supplement or amend disclosures. The supplemental information contained herein is true and correct to the best knowledge of Plaintiff at this time, but is subject to correction or further supplementation with any subsequently discovered errors or omissions. By supplementing her disclosures, Plaintiff is neither waiving any objections to, nor conceding the admissibility of the information disclosed. Subject to these reservations, pursuant to Federal Rule of Civil Procedure 26(e), Plaintiff makes the following supplemental disclosures to her initial disclosures under Federal Rule of Civil Procedure 26(a)(1)(A)(i) of individuals now known to

Plaintiff who are likely to have discoverable information that Plaintiff will use to support her claims:

Serena Olsen has knowledge of Plaintiff's return trip to the CRO in May 2019, including the transportation costs of that return trip. Her phone number is (510) 320-1299, and her address is 14012 Reed Avenue, San Leandro, California, 94578.

Emily Grimm has knowledge of Plaintiff's emotional distress after suffering discrimination by Defendants on March 29, 2019. Her phone number is (707) 704-0416, and her address is 34862 Lilac Street, Union City, California, 94587.

To the best of my knowledge, information, and belief, formed after an inquiry that is reasonable under the circumstances, this disclosure is complete and correct as of the time it is made.

DATED: March 16, 2022

Respectfully submitted,

TRE LEGAL PRACTICE

/s/ Albert Elia

Albert Elia

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Michelle Korosy, declare as follows:

1. I am a citizen of the United States, over 18 years of age, and not a party to the above-captioned action.  
My business address is TRE Legal Practice, 4226 Castanos Street, Fremont, CA 94536.
2. On March 16, 2022, I served the following document:  
PLAINTIFF'S SUPPLEMENTAL DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL  
PROCEDURE 26(e)
3. I accomplished this by causing the document listed above to be delivered via email to the  
attorneys for Defendants County of Alameda, Melissa Wilk, Eva He, and Maria Laura  
Briones at the email addresses set forth below.
  - a) Kevin Gilbert      kgilbert@ohshlaw.com
  - b) Nicholas D. Fine    nfine@ohshlaw.com

I declare under penalty of the laws of the United States of America and the State of California that the foregoing is true and correct, and that this declaration was executed in Clovis, California on March 16, 2022.

By: Michelle Korosy  
Michelle Korosy